

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In re : **Chapter 13**
 :
KYLE PERRY :
 :
 :
 :
Debtor : **Bankruptcy No. 09-10007 JKF**

**CHAPTER 13 STANDING TRUSTEE'S REPLY TO
DEBTOR'S MOTION TO SELL REAL ESTATE**

AND NOW comes, WILLIAM C. MILLER, ESQUIRE, Chapter 13 Standing Trustee, and replies to Debtor's Motion to Sell Real Estate as follows:

1. As provided in the Court's order scheduling a hearing, the standing trustee must approve any order authorizing the sale. A copy of a proposed order is attached.
2. The standing trustee must review a pro forma HUD 1 at or before the hearing.
3. Debtor will need to modify his plan to provide for the payment of the balance of his mortgage payments directly, at closing.
4. Assuming the mortgagee is paid directly, the standing trustee calculates that the balance of debtor's plan will be approximately, \$6,300, including trustee's commission.

WHEREFORE, WILLIAM C. MILLER, ESQUIRE, Chapter 13 standing trustee, respectfully requests that any order approving the sale take into account these issues.

Respectfully submitted,

Date: December 06, 2010

/s/ William C. Miller
William C. Miller, Esquire
Chapter 13 Standing Trustee
The Bourse Building
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